

11 Please File In Case

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

02/6

JOHN RICHARD JAE

Plattner

12.

SUPERINTENDENT DRAGONICH,

OFFICER VALENTINE,

OFFICER ZIMMERMAN,

OFFICER TAYLOR,

OFFICER Novak

OFFICER GRNEY and

OFFICER SWIFT,

Defendants.

Civil No. 1: CV-00-218

U.S. District Judge R

Magistrate Judge Smyser,

1 JURY TRIAL DEMAND

FILED

HARRISBURG, PA

FEB 1 2001

MARY E. DIANDREA, Clerk
Per [Signature]

Per
Deputy Clerk

AMENDED COMPLAINT

COMES NOW, the Plaintiff John Richard Doe, P. 2 Se and Informa
a Layman Unlettered in the Arts & Sciences of the Laws & Legal
Within the United States & now files his Amended Complaint her
the above-captioned CIV Rights Action, & who, over & above &

1. That, he is John Richard Doe, the Plaintiff in the above-entitled civil rights action, and he makes this Amendment pursuant to Fed. R. Civ. P. Rule 15(a).

2. Plaintiff John Richard Doe filed his initial CIRM rights pursuant to 42 U.S.C. §1983, herein the above-captioned CIRM, on about November 26, 2000.

3. Plaintiff John Richard Doe, now amends his initial Complaint as a matter of right, pursuant to Fed. R. Civ. P. Rule 15(a), and in herein by reference hereunto the same, all of that stated & set forth his initial Complaint and avers, deposes & states, as follows =

4. When Plaintiff complained to Defendant [redacted] Sup Dragovich about the acts, actions & conduct of Defendants [redacted] Zimmerman, Maylar, Novak, Noy and Swift, in opening & refusing to allow Plaintiff into the PHU when it was really [redacted] [redacted]

"You have a lot of nerve complaining given your poor behavior and constant abuse of our staff. When you can start acting like a human being, we can talk. Right now, your credibility is nil!!" (I quote/end quote!!).

5. That, the above-reply letter to Plaintiff was dated, Jan 26, 2000.

6. That, the above-response of Defendant Superintendent Dragovich, amounts to illegal retaliation for Plaintiff's behavior which the Plaintiff had already been punished for by the ARS Hearing Examiner and which shows [redacted] such Defendant's unwillingness to remedy the acts, actions & conduct of Defendant Valentine, Zimmerman, Taylor, Novak, Ney and Swift, and further shows Defendant Dragovich's unwillingness to follow and comply with Plaintiff's rights and the law under the Eighth Amendment of the United States Constitution.

7. That, by opening and refusing to close the windows in the room when it was really cold out, Defendants Valentine, Zimmerman, Taylor, Novak, and Swift each caused the Plaintiff to be subjected to imminent danger of serious physical injury because such caused Plaintiff to be placed at risk of catching pneumonia from the cold air through the open windows.

AND PLAINTIFF FURTHER SAYS THAT NAUGHT!!

"I declare under the penalty of perjury that the foregoing is true and correct, pursuant to 28 U.S.C. § 1746."

RESPECTFULLY SUBMITTED

28th JANUARY 2001:

(S)

John Richard Jae
MR. JOHN RICHARD JAE

#BQ-3219

SCJ-PHSHUGH

P.O. Box 4444

PHOTOGRAPH

Maevs. Dragovich, et al.
CIVIL No. 1:00-CV-00-2123
CERTIFICATE OF SERVICE

I Certify that on 1/29/01, I mailed to the persons listed below by 1st Class U.S. Mail, Postage paid, a true & correct carbon copy of the within Amended Complaint for each Defendant herein in the above entitled Civil Action.

I Certify that on 1/29/01, I gave to the person appearing for mailing to the Court, the original of the above named document.

"I certify under penalty of perjury & pursuant to 28 USC that the above is true & correct!"

MR. Ben C. Livingood
Superintendent's Assistant
SCI - Camp Hill
2500 Lehigh Road
P.O. Box 200
Camp Hill, PA 17001-8837

Dated/Executed on:
29th JANUARY 2001:
At: Pittsburgh, Pennsylvania:

(s) John Richard
MR. JOHN RICHARD
Plaintiff and As Seca